

CULPEPPER IP, LLLC  
Kerry S. Culpepper, Bar No. 9837  
75-170 Hualalai Road, Suite B204  
Kailua-Kona, Hawai'i 96740  
Telephone: (808) 464-4047  
Facsimile: (202) 204-5181  
E-Mail: kculpepper@culpepperip.com

Attorney for Plaintiff  
HB Productions, Inc.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

HB Productions, Inc., ) **Case No.: 1:19-cv-487-JMS-KJM**  
                        ) **(Copyright)**  
Plaintiff,           ) )  
vs.                   ) ) SECOND REQUEST FOR CLERK  
Muhammad Faizan,   ) ) TO ENTER DEFAULT AGAINST  
                        ) ) DEFENDANT MUHAMMAD  
Defendant.           ) ) FAIZAN; DECLARATION OF  
                        ) ) COUNSEL; CERTIFICATE OF  
                        ) ) SERVICE  
                        ) )  
                        ) )  
                        ) )  
                        ) )

---

**SECOND REQUEST FOR CLERK TO ENTER DEFAULT AGAINST  
DEFENDANT MUHAMMAD FAIZAN**

TO: CLERK OF THE ABOVE-ENTITLED COURT:

Pursuant to Fed R. Civ. P. 55(a), Plaintiff HB Productions, Inc. ("Plaintiff") hereby applies for entry of default by the Clerk of the Court against Defendant Muhammad Faizan. Defendant Muhammad Faizan was served a copy of the First

Amended Complaint (“FAC”) via airmail on Feb. 14, 2020 per Fed R. Civ. P. 5(b)(2)(C). *See* Certificate of Service [Doc. #41]. Defendant Muhammad Faizan was served a copy of the original Complaint on October 4, 2019. *See* Proof of Service [Doc. #14]; *see also* Supplemental Declaration of Muhammad Waqar [Doc. #21-2]. Service of the original Complaint was performed in accordance with the Hague Service Convention and the internal law or rule in Pakistan. *See* Affidavit of Muhammad Abeed Atiff [Doc. #14-1].

Defendant Muhammad Faizan’s responsive pleading to the FAC was due on or before February 28, 2020 per Fed R. Civ. P. 15(a)(3). Defendant has failed to appear or otherwise defend.

For these reasons, Plaintiff request that the Clerk of the Court enter default judgment on all claims plead in the FAC against Defendant Muhammad Faizan.

DATED: Kailua-Kona, Hawaii, March 2, 2020.

CULPEPPER IP, LLLC

/s/ Kerry S. Culpepper  
Kerry S. Culpepper

Attorney for Plaintiff